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\*Motion pro hac vice granted 9/9/11.  
\*\*Motion pro hac vice granted 6/11/12.  
\*\*\*Motion pro hac vice granted 2/1/16.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION

<p><b>Lair, et al.,</b></p> <p><i>Plaintiffs,</i></p> <p>v.</p> <p><b>Jonathan Motl, et al.,</b></p> <p><i>Defendants.</i></p>	<p>Case No. 6:12-cv-00012-CCL</p> <p><b>Declaration of Ronald Murray</b></p>
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I, Ronald Murray, make the following declaration pursuant to 28 U.S.C.

DECLARATION OF  
RONALD MURRAY

§ 1746:

1. I am over eighteen years of age and my statements set forth below are based on personal knowledge.

2. In 2010, I unsuccessfully ran for House District 69.

3. During that campaign, a friend and former legislator recommended Direct Mail for printing and mailing of my campaign literature.

4. After that recommendation, I met with Christian LeFer for about five minutes, and he told me about Direct Mail. During that short conversation, I told him that I was pro-life, pro-Second Amendment and supported right-to-work. I was happy to hear that he shared my views.

5. We did not talk about price during that meeting but because Direct Mail came highly recommended and because we shared the same views, I decided to use Direct Mail.

6. I am aware that Direct Mail did candidate profiles for those it was assisting in campaigns and recall filling one out. I do not have personal knowledge about what the company did with the profile, nor what they used it for but thought the purpose was to get to know me so Direct Mail could assist in drafting my campaign literature.

7. During my 2010 campaign, I was not familiar with the cost of

campaign literature but I received invoices from Direct Mail, and paid those invoices. I had no reason to believe that the invoices were incorrect and thought the costs seemed reasonable for the services provided. In total, I paid for over \$2,000 for my campaign literature.

8. When I lost the campaign, I got an email from Christian LeFer saying that I owed Direct Mail money and needed to pay. I owed them roughly \$1,000 but because money was tight and contributions were no longer coming in, I had to agree to payments in three installments. I have paid it all off.

9. The phrase "the works" means absolutely nothing to me. I think it could be the number of mailers I agreed to pay for and send from my campaign.

10. I did not authorize any National Right to Work, American Tradition Partnership, or Western Tradition Partnership spending to aid in my election, nor did I know of any such spending at the time. I never met with National Right to Work, American Tradition Partnership, or Western Tradition Partnership, or their agents for the purpose of being vetted.

11. An ad negatively discussing my opponent on issues was sent by a third party to the voters in my district but I was not aware of it until three days after it hit mailboxes. To this day, I have never seen the ad.

12. I never made an arrangement, explicit or implied, with Western

Tradition Partnership, American Tradition Partnership, National Right to Work, or Direct Mail that, in exchange for any efforts to get me elected, I would act in an official government capacity at their direction as a public official.

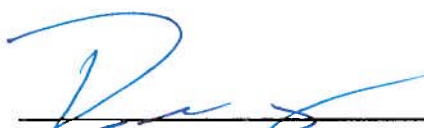
13. If they would have asked me to enter into such an agreement, I would have laughed at them and would have explained that I do not falter on my principles. My mind can only be changed by facts, not money or support. I have never and would never enter into such an agreement with anyone. Nor I am aware of any other legislator or candidate doing the same. I will only vote for things that are in line with my views.

14. In November 2013, Commissioner Motl notified me that he was reopening an already resolved complaint filed against me by my opponent Ted Washburn to add the issue of coordination, and in December 2013, Commissioner Motl issued findings of coordination and in-kind corporate contributions in violation of campaign finance law based on my association with Direct Mail. He filed a civil complaint against me in civil court promptly thereafter. None of these documents allege quid pro quo corruption.

15. I will not run again because of these allegations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on <sup>APRIL</sup>~~March~~ 1, 2016.

  
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